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14 Attorneys for Defendants  
15 SAM HOLDINGS, LLC, HANDSON VENTURES,  
16 LLC, RUSTIC CANYON, LLC and HOV GLOBAL  
17 SERVICES LTD.

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29 Attorneys for Plaintiffs  
30 EDDIE KING, DEBBIE KING, BILLY RAY  
31 PITCHER, and JOHN W. MALONEY

32  
33 UNITED STATES DISTRICT COURT  
34 NORTHERN DISTRICT OF CALIFORNIA

35 EDDIE KING, an individual; DEBBIE  
36 KING, an individual; BILLY RAY  
37 PITCHER, an individual; and JOHN W.  
38 MALONEY, an individual,

39 Plaintiff,

40 **Case No. 5:10-cv-04706 EJD HRL**

41 ~~PROPOSED~~ ORDER  
42 GRANTING REQUEST OF COUNSEL FOR  
43 PLAINTIFFS AND DEFENDANTS TO EXTEND  
44 THE DEADLINES TO COMPLETE FACT  
45 DISCOVERY AND FILE/SERVE DISPOSITIVE  
46 MOTIONS FOR SIXTY DAYS.

1  
2 v.  
3 SAM HOLDINGS, LLC, a limited liability  
4 company; HANDSON VENTURES, LLC,  
5 a limited liability company; RUSTIC  
6 CANYON LLC and HOV GLOBAL  
7 SERVICES LTD,  
8  
9 Defendants.

10 SAM HOLDINGS, LLC, a limited liability  
11 company,  
12  
13 Counter-Claimant,  
14  
15 v.  
16  
17 EDDIE KING, an individual; DEBBIE  
18 KING, an individual; BILLY RAY  
19 PITCHER, an individual; and JOHN W.  
20 MALONEY, an individual,  
21  
22 Counter-Defendants.

**Judge: District Judge Edward J. Davila**

**Fact Discovery Deadline:**  
**October 19, 2011**

**Deadline to File/Serve Dispositive Motions:**  
**October 31, 2011**

13 TO ALL PARTIES AND COUNSEL OR RECORD:

14  
15 IT IS HEREBY STIPULATED by and between Plaintiffs, EDDIE KING, DEBBIE  
16 KING, BILLY RAY PITCHER and JOHN W. MALONEY (“Plaintiffs”), by and through their  
17 undersigned counsel, and Defendants, SAM HOLDINGS, LLC, HANDSON VENTURES, LLC,  
18 RUSTIC CANYON, LLC, and HOV GLOBAL SERVICES LTD (“Defendants”), by and through  
19 their undersigned counsel, that the existing deadlines to complete fact discovery and to file/serve  
20 dispositive motions be extended by sixty (60) days for the purpose of allowing each party to take  
21 additional depositions as follows:  
22

23 1. The Court previously entered its *Stipulation And Order To Modify Case*  
24 *Management Scheduling Order* on August 10, 2011 modifying certain deadlines, including the  
25 deadlines to complete fact discovery and file/serve dispositive motions. [Docket No. 29]. The  
26 existing deadline to complete fact discovery is October 19, 2011, and the deadline to file/serve  
27 dispositive motions is October 31, 2011.  
28

2. Counsel for all parties agree to extend the fact discovery deadline for sixty (60) days to allow for the taking of additional depositions that have not yet been taken and to take a second deposition of Peter Grossman if allowed. Counsel and parties have diligently pursued discovery and have taken many depositions. However, parties and witnesses are located in various geographical areas and there are additional depositions that need to be taken, additional documents to be produced, and interrogatories that remain outstanding.

3. Counsel for all parties further agree that the deadline for filing dispositive motions should be extended by sixty (60) days because the additional depositions and discovery will impact the need for and facts associated with any dispositive motions.

4. The Court previously vacated the trial date in this action and counsel do not expect that trial will take place for many months.

It is respectfully requested that the above requests for extension of Court ordered deadlines be granted and notice sent to all parties regarding the new deadlines to complete fact discovery and file/serve dispositive motions.

Respectfully submitted,

Dated: September 30, 2011

## NELSON LAW GROUP

By:/s/ Robert S. Nelson  
ROBERT S. NELSON

Dated: September 30, 2011

## LONG LAW OFFICES

By:/s/ H. Clyde Long  
H. CLYDE LONG

1  
2 Attorneys for Plaintiffs EDDIE KING,  
3 DEBBIE KING, BILLY RAY  
4 PITCHER, and JOHN W. MALONEY  
5  
6

7 Dated: September 30, 2011  
8  
9

10 ERICKSEN ARBUTHNOT  
11  
12

13 By:/s/ Steve W. Dollar  
14 STEVE W. DOLLAR  
15  
16

17 Dated: September 30, 2011  
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19

20 BOVIS, KYLE & BURCH, LLC  
21  
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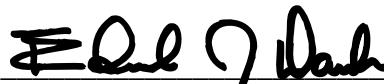
23 By:/s/ Melanie M. Norvell  
24 MELANIE M. NORVELL  
25 (Appearing Pro Hac Vice)  
26  
27

28 Attorneys for Defendants SAM  
HOLDINGS, LLC, HANDSON  
VENTURES, LLC, RUSTIC CANYON,  
LLC and HOV GLOBAL SERVICES  
LTD.  
29  
30

31 **ORDER OF THE COURT**  
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34 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**  
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37 Dated: October 6, 2011  
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40   
41 JUDGE, UNITED STATES DISTRICT COURT  
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